

MONTGOMERY, McCRACKEN, WALKER & RHODES, LLP
ATTORNEYS AT LAW

123 SOUTH BROAD STREET
AVENUE OF THE ARTS
PHILADELPHIA, PA 19109
215-772-1500
FAX 215-772-7620

300 DELAWARE AVENUE
SUITE 750
WILMINGTON, DE 19801
302-504-7800
FAX 302-504-7820

LIBERTYVIEW
457 HADDONFIELD ROAD, SUITE 600
CHERRY HILL, NJ 08002
856-488-7700
FAX 856-488-7720

RICHARD G. PLACEY
ADMITTED IN DELAWARE, ILLINOIS,
NEW JERSEY & PENNSYLVANIA
DIRECT DIAL: (302) 504-7880

February 21, 2007

Via Hand Delivery

Magistrate Judge Mary Pat Thyng
United States District Court for the District of Delaware
J. Caleb Boggs Federal Building
844 N. King Street, Room 6100
Lockbox 8
Wilmington, DE 19801

**Re: Kentucky Speedway, LLC v. National Association of Stock Car
Auto Racing, Inc. et al; Case No. 1:06-mc-00203-KAJ**

Dear Judge Thyng:

Your Honor may recall that at the telephone hearings in this matter a ruling was issued that the Confidentiality Order in the main litigation in Kentucky would be entered as an order of this Court governing the documents being produced by Dover Motorsports, Inc. Your Honor directed the parties to settle on a form of order to carry out that ruling and to memorialize the partial resolution of the privilege log issue.

In that regard, I enclose herewith for the Court's consideration a proposed order in this action that all parties that appeared at the conferences agree carries out those directions. Accordingly, we ask that Your Honor consider and enter this form of order.

Needless to say, we are available at the Court's convenience to answer any questions.

Respectfully yours,



Richard G. Placey (DE 4206)

cc: John M. Seaman (w/encl) – via hand delivery
Justin A. Nelson, Esquire (w/encls.) – via mail
Kimberly S. Amrine, Esquire (w/encls.) – via mail
Robert B. Craig, Esquire (w/encls.) - via mail
Guy Wade, Esquire (w/encls.) - via mail
Helen Maher, Esquire (w/encls.) - via mail